



United States Department of the Interior  
BUREAU OF INDIAN EDUCATION

Cove Day School  
P.O. Box 2000  
Red Valley, Arizona 86544  
Telephone #: (928) 653-4457  
Fax #: (928) 653-4415



April 5, 2013

Dear FCC:

Let this letter serve as a Request for WAIVER: CC Docket No. 02-6.

Cove Day School tried to get the report in on Monday, March 25, 2013 as March 24, 2013 was a Sunday. The appeal letter was returned March 25, 2013 as undeliverable. Again, the appeal was sent again on March 26, 2013 the appeal was returned again. After several attempts found the reason why it was returned was the email address sent to had a *dot* at the end of *org*. Thereafter, the appeal was sent without problems.

Two failed delivery notices were sent. One dated Monday, March 25, 2013 and another on March 26, 2013. Each of the fail notices are attached and have dates highlighted for your review

Cove Day School respectfully requests full Erate funding. Thank you for your consideration.

Best,

*Dr. Melanie Haskan*  
Dr. Melanie Haskan, Principal

**Haskan, Melanie**

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**From:** Microsoft Outlook  
**To:** [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org).  
**Sent:** Tuesday, March 26, 2013 7:47 AM  
**Subject:** Undeliverable: Sending Appeals Documents again

**Delivery has failed to these recipients or distribution lists:**

[appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org).

The format of the recipient's e-mail address isn't valid. A valid address looks like this: [username@contoso.com](mailto:username@contoso.com). Microsoft Exchange will not try to redeliver this message for you. Please check the e-mail address and try sending the message again, or provide the following diagnostic text to your system administrator.

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Sent by Microsoft Exchange Server 2007

**Diagnostic information for administrators:**

Generating server: IIEABQEXCH02.BIE.EDU

[appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org).

#550 5.1.3 STOREDRV.Submit; invalid recipient address #SMTP#

Original message headers:

Received: from iieabqexvclstr.BIE.EDU ([169.254.2.97]) by IIEABQEXCH02.BIE.EDU ([169.203.31.25]) with mapi; Tue, 26 Mar 2013 08:46:34 -0600  
MIME-Version: 1.0  
Content-Type: text/plain  
Date: Tue, 26 Mar 2013 08:46:34 -0600  
Message-ID: <[B849611603497D49B3D39A2BC4AE506790EA87@IIEABQEXVCLSTR.BIE.EDU](mailto:B849611603497D49B3D39A2BC4AE506790EA87@IIEABQEXVCLSTR.BIE.EDU)>  
Subject: Sending Appeals Documents again



Sending Appeals  
Documents agai...

## Haskan, Melanie

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**From:** Microsoft Outlook  
**To:** [appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org).  
**Sent:** Monday, March 25, 2013 4:02 PM  
**Subject:** Undeliverable: Appeal Documents from Cove Day School

### Delivery has failed to these recipients or distribution lists:

[appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org).

The format of the recipient's e-mail address isn't valid. A valid address looks like this: [username@contoso.com](mailto:username@contoso.com). Microsoft Exchange will not try to redeliver this message for you. Please check the e-mail address and try sending the message again, or provide the following diagnostic text to your system administrator.

---

Sent by Microsoft Exchange Server 2007

### Diagnostic information for administrators:

Generating server: IIEABQEXCH01.BIE.EDU

[appeals@sl.universalservice.org](mailto:appeals@sl.universalservice.org).

#550 5.1.3 STOREDRV.Submit; invalid recipient address #SMTP#

### Original message headers:

Received: from iieabqexvclstr.BIE.EDU ([169.254.2.97]) by IIEABQEXCH01.BIE.EDU ([169.203.31.24]) with mapi; Mon, 25 Mar 2013 17:01:30 -0600  
MIME-Version: 1.0  
Content-Type: text/plain  
Date: Mon, 25 Mar 2013 17:01:30 -0600  
Message-ID: <[B849611603497D49B3D39A2BC4AE506790E9BB@IIEABQEXVCLSTR.BIE.EDU](mailto:B849611603497D49B3D39A2BC4AE506790E9BB@IIEABQEXVCLSTR.BIE.EDU)>  
Subject: Appeal Documents from Cove Day School



Appeal Documents  
from Cove Day...

Dr. Melanie Haskan  
Cove Day School  
P.O. Box 2000  
Red Valley, AZ 86544-2000

Billed Entity Number: 99261  
Form 471 Application Number: 792466  
Form 486 Application Number:



**Universal Service Administrative Company**  
Schools & Libraries Division

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**Administrator's Decision on Appeal – Funding Year 2011-2012**

March 28, 2013

Dr. Melanie Haskan  
Cove Day School  
P.O. Box 2000  
Red Valley, AZ 86544-2000

Re: Applicant Name:	COVE DAY SCHOOL
Billed Entity Number:	99261
Form 471 Application Number:	792466
Funding Request Number(s):	2144315
Decision Letter Date:	January 24, 2013
Date Appeal Postmarked:	March 26, 2013
Your Correspondence Dated:	March 26, 2013

Our records show that your appeal was postmarked more than 60 days after the date your Funding Commitment Decision Letter was issued, as shown above. Federal Communications Commission (FCC) rules require applicants to postmark appeals within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in full, partially approved, dismissed, or canceled, you may file an appeal with the FCC. You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options for filing an appeal directly with the FCC can be found in the "Appeals Procedure" posted in the Reference Area of the SLD section of the USAC website or by contacting the Client Service Bureau. We strongly recommend that you use the electronic filing options.

Schools and Libraries Division  
Universal Service Administrative Company





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Cove Day School  
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Red Valley, Arizona 86544  
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Dec 24, 2012  
Melanie Haskan

COVE DAY SCHOOL

Telephone: (928) 6534457

Application Number 792466

**Response Due Date: 12/28/2012**

You were recently sent a request for additional information needed by the Program Integrity Assurance (PIA) team to review your Funding Year 2012 FCC Form 471 application to ensure that it is in compliance with the rules of the Universal Service program. This is a reminder that your response due date is approaching. The documentation we received regarding your FRN(s) was incomplete and/or we have additional questions regarding your FRNs. Please respond to the following questions in Their entirety. If you feel you have responded to the question already or you need a further explanation, please feel free to contact me.

#### **I. Ineligible items**

Based on the documentation that you provided during the review of your FY 2011 Form 471 application 792466, we intend to modify FRN to change the pre-commitment funding request. The pre-commitment funding request has been changed from \$28,247.52/year to \$25,782.24/year to remove the ineligible Blonder Tongue set top box and the 95% eligible Cisco 2851 VOIP system.

We are providing you with an opportunity to confirm that your original response(s) that was the basis for this change is correct. Please confirm that this change(s) listed above should be undertaken. Yes or X No.

No, we do not agree to this reduction. There appears to be some confusion here. The FRN you are referencing is FRN 2144315 for \$28,247.52 for Basic Maintenance. Since it is for Basic Maintenance it does not make sense to reduce our Basic Maintenance dollars by the cost of the ineligible equipment. Instead, it should be reduced by the cost-allocated amount of our labor to provide Basic Maintenance to the ineligible equipment.

The Blonder Tongue equipment provides video distribution to the school. Based on our Item 21 Attachment, the cost of the various components is listed below. The Setup top Boxes are \$905.26 out of a total of 7802.22 or approx. 12%.

#### **Schools and Libraries Division**

We have allocated 6 Hours of Basic Maintenance to the Video Distribution System which includes the Set Top Box, The IPTV MPEG Encoder and the Chassis & Power Supply. (See the BM Equipment Cost Allocation)

Therefore, 6 Hours \* 12% = .72 Hours. .72 Hours \* our hourly rate of \$85.64 = \$61.66. Tax on \$61.66 \* .07 = \$4.32. The total reduction should be \$65.98.

3 Blonder Tongue IP-to-RF set-top box  
with remote control 2431 IP-AmiNET110 \$301.75 \$905.26

4 Blonder Tongue IPTV MPEG-2  
Encoder 2420 IPME-2 \$1,543.79 \$6,175.15

2 Blonder Tongue Chassis and power  
supply 2419 IPME-CH \$360.91 \$721.81

We agree to reduction of the Blonder Tongue set top box for .72 hours of Basic Maintenance at a rate of \$85.60 per hour totaling \$65.98.

As for the 95% eligible Cisco 2851 VOIP system we allocated 24 hours of Basic Maintenance Labor for the entire phone system as listed below. Note that the ineligible component is approx.



51% of the total hardware cost of the support phone system. ( $\$5,650.39/\$11,109.47 = 51\%$ )  
Therefore, the ineligible hours would be 24 hours x 51% = 12.2 hours \* 5% = .61 hours ineligible time. Our rate of \$85.60 x .61 hours is \$52.25, plus tax at 7% = 3.66 for a total reduction of \$55.91.

Recap:

FRN # 2144315 should be reduced by the following amounts.

Blonder Tongue set top box = \$65.98

Cisco 2851 VOIP Phone System = \$55.91

Therefore we agree to the grand total reduction of FRN 2144315 for the amount of:

**\$65.98 + \$55.91 = \$121.89**

If the change should not be undertaken and you have alternative information, please provide documentation that supports your position. Please keep in mind that your supporting documentation should be the documentation or data used to prepare your Form 471 application. Examples of supporting documentation are contracts, vendor quotes, vendor bills, invoices, etc. If you fail to respond to this email within 15 days, we will perform the action(s) listed above. Please fax or e-mail the requested information to my attention. If you have any questions please feel free to contact me.

It is important that we receive all of the information requested so PIA can complete its review.

**Failure to respond may result in a reduction or denial of funding.**

**If we do not receive the information by 12/28/2012, your application will be reviewed using the information currently on file. If you need additional time to prepare your response, please let me know as soon as possible.**

Should you wish to cancel your FCC Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s); along with the FCC Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Alexander Bianco

Associate Manager, Program Integrity Assurance

30 Lanidex Plaza West | Parsippany, NJ 07054

T: 973.581.5226 | F: 973.599.6578

[abianco@sl.universalservice.org](mailto:abianco@sl.universalservice.org)

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Fax: (928) 653-4415



Dec 13, 2012  
Deborah Belone  
COVE DAY SCHOOL  
Telephone: (928) 6534457  
Application Number 792466  
**Response Due Date: 12/28/2012**

**Attachments:**

**COVE - Y14 - Item 21 Attachment - CamNet BM**

The Program Integrity Assurance (PIA) team is in the process of reviewing all Funding Year 2011 FCC Form 471 Applications to ensure that they are in compliance with the rules of the Universal Service program. We are currently in the process of reviewing your Funding Year 2011 FCC Form 471 Application. To complete our review, we need some additional information. The information needed to complete the review is listed below.

**I. Backup Server Function (2144315)**

Please indicate what the Backup server labeled "Network Storage server" will be storing or backing up.

The Network Storage Server will be backing up Erate eligible data from the DNS/DHCP servers listed below.

**1 Dell PowerEdge R710 Rack Mount Servers-DHCP**

**Server Dell R710**

**1 Dell PowerEdge R710 Rack Mt Server, DNS Dell R710**

II.

**Schools and Libraries Division**

**III. Ineligible items**

Based on the documentation that you provided during the review of your FY 2011 Form 471 application 792466, we intend to modify FRN to change the pre-commitment funding request.

The pre-commitment funding request has been changed from **\$28,247.52/year** to **\$25,782.24/year** to remove the ineligible Blonder Tongue set top box and the 95% eligible Cisco 2851 VOIP system.

We are providing you with an opportunity to confirm that your original response(s) that was the basis for this change is correct. Please confirm that this change(s) listed above should be undertaken.        Yes or   X   No.

No, we do not agree to this reduction. There appears to be some confusion here. The FRN you are referencing is FRN 2144315 for \$28,247.52 for Basic Maintenance. Since it is for Basic Maintenance it does not make sense to reduce our Basic Maintenance dollars by the cost of the ineligible equipment. Instead, our Internal Connections Request, FRN 2144307 should be reduced by the cost of the ineligible equipment.

Our Basic Maintenance contract is for Eligible tasks and services only. So, although the **Blonder Tongue set top box and the 95% eligible Cisco 2851 VOIP system** have ineligible features we do not service or support any ineligible features under this contract. Our Basic Maintenance tasks are only on the eligible portions of this piece of equipment which is the video distribution itself. The school would be charged separately for any services for ineligible tasks. Therefore no cost allocation is necessary for Basic Maintenance of the **Blonder Tongue set top box and the 95% eligible Cisco 2851 VOIP system**.

Please see the attachment "COVE - Y14 - Item 21 Attachment - CamNet BM" for documentation stating to the school that they are responsible for charges on services not covered by Erate.



If the change should not be undertaken and you have alternative information, please provide documentation that supports your position. Please keep in mind that your supporting documentation should be the documentation or data used to prepare your Form 471 application. Examples of supporting documentation are contracts, vendor quotes, vendor bills, invoices, etc. If you fail to respond to this email within 15 days, we will perform the action(s) listed above. Please fax or email the requested information to my attention. If you have any questions or if you require a further explanation of this request, please feel free to contact me.

It is important that we receive all of the information requested **within 15 calendar days** so we can complete our review. **Failure to respond may result in a reduction or denial of funding.** If you need additional time to prepare your response, please let me know as soon as possible.

Should you wish to cancel your FCC Form 471 application(s), or any of your individual funding requests, please clearly indicate in your response that it is your intention to cancel an application or funding request(s). Include in any cancellation request the FCC Form 471 application number(s) and/or funding request number(s), and the complete name, title and signature of the authorized individual.

Thank you for your cooperation and continued support of the Universal Service Program.

Alexander Bianco

Associate Manager, Program Integrity Assurance

30 Lanidex Plaza West | Parsippany, NJ 07054

T: 973.581.5226 | F: 973.599.6578

[abianco@sl.universalservice.org](mailto:abianco@sl.universalservice.org)

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Dec 24, 2012  
Melanie Haskan

COVE DAY SCHOOL

Telephone: (928) 6534457

Application Number 792466

**Response Due Date: 12/28/2012**

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**I. Ineligible items**

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**Schools and Libraries Division**

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We agree to reduction of the Blonder Tongue set top box for .72 hours of Basic Maintenance at a rate of \$85.60 per hour totaling \$65.98.

As for the 95% eligible Cisco 2851 VOIP system we allocated 24 hours of Basic Maintenance Labor for the entire phone system as listed below. Note that the ineligible component is approx. 51% of the total hardware cost of the support phone system. (\$5,650.39/\$11,109.47 = 51%)



Therefore, the ineligible hours would be  $24 \text{ hours} \times 51\% = 12.2 \text{ hours} \times 5\% = .61 \text{ hours ineligible time}$ . Our rate of  $\$85.60 \times .61 \text{ hours}$  is  $\$52.25$ , plus tax at  $7\% = 3.66$  for a total reduction of  $\$55.91$ .

Recap:

FRN # 2144315 should be reduced by the following amounts.

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Cisco 2851 VOIP Phone System =  $\$55.91$

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Thank you for your cooperation and continued support of the Universal Service Program.

Alexander Bianco

Associate Manager, Program Integrity Assurance

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[abianco@sl.universalservice.org](mailto:abianco@sl.universalservice.org)

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